

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAURA GARCIA and LORE REDNOUR,)
individually and on behalf of others similarly)
situated,)
Plaintiffs,) CIVIL ACTION NO. 12-CV-03687
v.) Hon. Joan B. Gottschall
J.C. PENNEY CORPORATION, INC.,)
Defendant.)

JOINT MOTION TO DISMISS CLASS ACTION WITH PREJUDICE

The Parties jointly request that this case be dismissed with prejudice and, in support, state as follows:

1. On August 9, 2017, the Court granted final approval of the Parties' class action settlement. ECF No. 227. The Court's Order of Final Approval states, in part, that "[u]pon satisfaction of the terms of the Settlement Agreement, the Settlement Administrator shall terminate the Settlement Account and serve and file its final report, and the Parties shall submit a joint motion to enter a judgment dismissing the Class Action with prejudice." *Id.* at ¶16.

2. On April 5, 2018, the Court ordered the Parties to file a joint status report or motion to dismiss the action with prejudice pursuant to the settlement agreement by May 2, 2018. ECF No. 233.

3. The Settlement Administrator's Final Report was filed with the Court on April 4, 2018 (ECF No. 232), in accordance with the Court's Final Approval Order (ECF No. 227). The Final Report details the manner in which the terms of the Settlement Agreement were satisfied, including the final distribution of the Settlement Funds to Class Members and the amount of

residual funds in the Settlement Account to be distributed to the *cy pres* recipient, Legal Aid Foundation. ECF No. 232.

4. The information contained in the Final Report confirms that the Settlement Agreement has been fully administered. The Parties therefore request that this Court enter a judgment dismissing the Class Action with prejudice pursuant to the Settlement Agreement.

Date: May 2, 2018

Respectfully submitted,

s/Douglas M. Werman
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